

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
NIKE, INC. and NIKE USA, INC.,	:	12 Civ. 2275 (PKC) (RLE)
	:	
Plaintiffs,	:	
	:	
-against-	:	<u>AFFIDAVIT</u>
	:	
REEBOK INTERNATIONAL LTD.,	:	
	:	
Defendant.	:	
-----X	:	

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

JULIAN W. FRIEDMAN, being duly sworn, deposes and says:

1. I am a member of the law firm Stillman & Friedman, P.C., attorneys for Defendant Reebok International Ltd. ("Reebok") in this matter. I submit this Affidavit in opposition to Plaintiffs' Motion for a Preliminary Injunction. More particularly, I submit this Affidavit in order to describe, and set before the Court, the documents which are being submitted by Reebok in opposition to the Motion.

2. In addition to this Affidavit, Reebok is submitting the following documents in opposition to the Motion: the Affidavit of Kenneth P. Gamble; the Affidavit of Blake Lundberg; the Affidavit of Sol Werdiger; and a Memorandum of Law.

3. The following additional documents are attached as Exhibits to this Affidavit:

a. Attached as Exhibit A are excerpted portions of the deposition transcript of the April 2, 2012 deposition of Kenneth Gamble.

b. Attached as Exhibit B are excerpted portions of the deposition transcript of the April 2, 2012 deposition of Glen Giovanucci.

c. Attached as Exhibit C are excerpted portions of the deposition transcript of the April 2, 2012 deposition of John Warren.

d. Attached as Exhibit D are excerpted portions of the deposition transcript of the April 2, 2012 deposition of Keith Gordon.

e. Attached as a collective Exhibit E are copies of Exhibits 1 through 21 that were marked during the depositions in this matter held on April 2, 2012. A brief description of those Exhibits follows:

(i) Exhibits 1 through 4 are email exchanges relevant to this matter.

(ii) Exhibit 5 is the License Agreement between National Football League Players Incorporated ("Players Inc.") and the Sports Licensed Division/adidas Group the term of which ran through February 28, 2012.

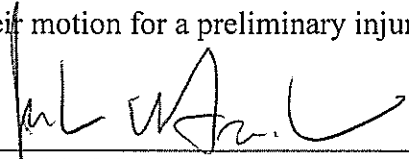
(iii) Exhibits 6 through 11 are further relevant email exchanges.

(iv) Exhibit 12 is an earlier License Agreement between Players Inc. and the Sports Licensed Division/adidas Group.

(v) Exhibit 13 is a April 2, 2012 Stipulation between counsel for the parties pertaining to the deposition of Keith Gordon of Players Inc., and disclosing the general subject matter of conversations between Mr. Gordon and Ahmad Nassar, counsel to Players, Inc.

(vi) Exhibits 14 through 20 are further relevant email exchanges.

(vii) Exhibit 21 is a copy of the Declaration of Keith Gordon that was submitted by Plaintiffs in support of their motion for a preliminary injunction.



Julian W. Friedman

Sworn to before me this
3rd day of April 2012



Notary Public

CHRISTINE NATOLI
Notary Public, State of New York
No. 31-4865762
Qualified in New York County 2014
Commission Expires July 14, _____